

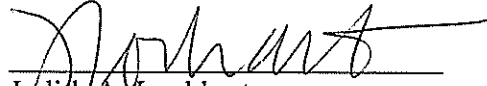
Defendant FremantleMedia North America, Inc. (“Fremantle”) respectfully submits this reply memorandum of law, and further adopts and relies on the Reply Memorandum of Law in Further Support of Motion to Dismiss the Complaint submitted by Condé Nast on May 23, 2018, in further support of Fremantle’s motion to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) and 12(b)(7).

As previously stated, Fremantle serves as Condé Nast’s licensing agent and authorized representative. Complaint ¶ 9, Ex. C. at 1. The allegations set forth in the Complaint against Fremantle and Condé Nast are substantively identical. More specifically, all of the causes of action in the Complaint are asserted against Condé Nast and Fremantle and the allegations forming the basis of these claims are all commonly asserted against Condé Nast and Fremantle (*see e.g.* Complaint ¶¶ 31-88). Accordingly, for the same reasons set forth in Condé Nast’s Reply Memorandum of Law in Further Support of Motion to Dismiss the Complaint filed on May 23, 2018, Fremantle joins Condé Nast in respectfully requesting that the Motion to Dismiss be granted and the Complaint be dismissed in its entirety and with prejudice.

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